

***Remarks***

Reconsideration of this Application is respectfully requested.

Applicants respectfully request admission of the foregoing amendment to place the application in condition for allowance by traversing the rejections under 35 U.S.C. § 102.

Upon entry of the foregoing amendment, claims 1-20 are pending in the application, with claims 1, 7, 13, 15, 17, and 18 being the independent claims. Claims 13 and 15 are sought to be amended. These changes are believed to introduce no new matter, and their entry is respectfully requested.

Based on the above amendment and the following remarks, Applicants respectfully request that the Examiner reconsider all outstanding rejections and that they be withdrawn.

***Rejections Under 35 U.S.C. § 102***

***Spence***

The Office Action rejected claims 13 and 14 under 35 U.S.C. § 102(b) as being anticipated by U.S. Patent No. 4,549,100 to Spence (hereinafter "Spence"). (See, Office Action at p. 2.) Applicants traverse these rejections.

Amended independent claim 13 recites (emphasis added):

A reset circuit for a latch circuit having a bistable pair of transistors connected to a supply voltage, the reset circuit comprising:

a first transistor connected to the supply voltage ***at a first terminal of said first transistor;***

a second transistor connected between ***a second terminal of said first transistor*** and a first port of the latch circuit, wherein a gate terminal

of said second transistor is connected to a drain terminal of said second transistor at said first port; and

a third transistor connected between *said second terminal of said first transistor* and a second port of the latch circuit, wherein a gate terminal of said third transistor is connected to a drain terminal of said third transistor at said second port;

wherein transistors of said latch circuit, said first transistor, said second transistor, and said third transistor are all characterized by a common channel type, said common channel type being one of a p-channel type and a n-channel type.

Spence does not disclose, teach, or suggest a reset circuit having a first transistor, a second transistor, a third transistor in which the first transistor has a first terminal connected to a supply voltage and a second terminal connected to the second transistor and the third transistor. Therefore, Spence does not anticipate claim 13. Likewise, claim 14, which depends directly from claim 13, is not anticipated by Spence. Claim 14 is also allowable because of its additional distinctive features. Accordingly, Applicants respectfully request that the Examiner reconsider and remove his rejections of claims 13 and 14 under 35 U.S.C. § 102(e) with respect to Spence.

*Ang*

The Office Action rejected claims 15 and 16 under 35 U.S.C. § 102(e) as being anticipated by U.S. Patent No. 6,147,515 to Ang *et al.* (hereinafter "Ang"). (*See*, Office Action at p. 3.) Applicants traverse these rejections.

Amended independent claim 15 recites (emphasis added):

An analog-to-digital converter, comprising:

a comparator having a first input for receiving an analog signal and a second input for receiving a reference signal, said comparator for producing a digital signal;

wherein said comparator comprises a latch circuit having a bistable pair of transistors coupled between a reset circuit and a first supply voltage, and a vertical latch coupled between said first supply

voltage and a second supply voltage and coupled to said bistable pair of transistors ***at a node coupled to said reset circuit***, said vertical latch having a first transistor and a second transistor, said first transistor being of a first channel type, said second transistor being of a second channel type, said first channel type being one of a p-channel type and a n-channel type, said second channel type being different from said first channel type.

Ang does not disclose, teach, or suggest a latch circuit having a bistable pair of transistors coupled between a reset circuit and a first supply voltage, and a vertical latch coupled between the first supply voltage and a second supply voltage and coupled to the bistable pair of transistors at a node coupled to the reset circuit. Therefore, Ang does not anticipate claim 15. Likewise, claim 16, which depends directly from claim 15, is not anticipated by Ang. Claim 16 is also allowable because of its additional distinctive features. Accordingly, Applicants respectfully request that the Examiner reconsider and remove his rejections of claims 15 and 16 under 35 U.S.C. § 102(b) with respect to Ang.

#### ***Allowable Subject Matter***

The Office Action indicates that "[c]laims 1-12 and 17-20 are presently allowed."  
(Office Action at p. 3.)

#### ***Conclusion***

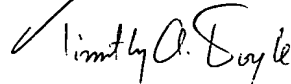
All of the stated grounds rejection have been properly traversed. Applicants therefore respectfully request that the Examiner reconsider all presently outstanding rejections and that they be withdrawn. Applicants believe that a full and complete reply

has been made to the outstanding Office Action and, as such, the present application is in condition for allowance. If the Examiner believes, for any reason, that personal communication will expedite prosecution of this application, the Examiner is invited to telephone the undersigned at the number provided.

Prompt and favorable consideration of this Amendment and Reply is respectfully requested.

Respectfully submitted,

STERNE, KESSLER, GOLDSTEIN & FOX P.L.L.C.



Timothy A. Doyle  
Attorney for Applicants  
Registration No. 51,262

Date: 6 JUN 05

1100 New York Avenue, N.W.  
Washington, D.C. 20005-3934  
(202) 371-2600